



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 29, 2022

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Parnas*, S1 19 Cr. 725 (JPO)

Dear Judge Oetken:

The Government respectfully writes to submit a proposed consent preliminary order of forfeiture as to defendant Lev Parnas in the amount of \$1,761,200, which represents the sum of criminal proceeds Mr. Parnas derived from the wire fraud conspiracy charged in Count Seven. Counsel for Mr. Parnas consents to the entry of this order.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: _____/s/_____
Rebekah Donaleski
Aline R. Flodr
Nicolas Roos
Hagan Scotten
Assistant United States Attorneys
(212) 637-2423

Cc: Counsel for the defendant (by ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	CONSENT PRELIMINARY ORDER
	:	OF FORFEITURE/
- v. -	:	<u>MONEY JUDGMENT</u>
LEV PARNAS,	:	
	:	S2 19 Cr. 725 (JPO)
Defendant.	:	
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WHEREAS, on or about September 17, 2020, LEV PARNAS (the “Defendant”), among others, was charged in a seven-count Superseding Indictment S1 19 Cr. 725 (JPO) (the “Indictment”) with conspiracy to perpetrate a campaign finance scheme in violation of Title 18, United States Code, Section 371 and Title 52, United States Code, Sections 30122 and 30109(d)(1)(A) & (D) (Count One); making false statements to the Federal Election Commission in violation of Title 18, United States Code, Sections 1001(a)(2) and 2 (Count Two); falsification of records in violation of Title 18, United States Code, Sections 1519 and 2 (Count Three); conspiracy to commit campaign contribution fraud in violation of Title 18, United States Code, Section 371 and Title 52, United States Code, Sections 30121, 30122 and 30109(d)(1)(A) & (D) (Count Four); solicitation of a contribution by a foreign national in violation of Title 52, United States Code, Sections 30121 and 30109(d)(1)(A) and Title 18, United States Code, Section 2 (Count Five); making a contribution by a foreign national in violation of Title 52, United States Code, Sections 30121 and 30109(d)(1)(A) and Title 18, United States Code, Section 2 (Count Six); and conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 1349 (Count Seven);

WHEREAS, the Indictment included a forfeiture allegation as to Count Seven of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code,

Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count Seven of the Indictment;

WHEREAS, on or about March 25, 2022, the Defendant pled guilty to Count Seven of the Indictment;

WHEREAS, the Defendant admits the forfeiture allegation with respect to Count Seven of the Indictment and consents to the entry of a money judgment in the amount of \$1,761,200 in United States currency, representing the amount of proceeds traceable to the commission of the offense charged in Count Seven of the Indictment that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count Seven of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney, Rebekah Donaleski, of counsel, and the Defendant, and his counsel, Joseph Bondy, Esq., that:

1. As a result of the offense charged in Count Seven of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$1,761,200 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense

charged in Count Seven of the Indictment that the Defendant personally obtained shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, LEV PARNAS, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: *Rebekah Donaleski*
REBEKAH DONALESKI
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2423

8/24/22
DATE

LEV PARNAS

By: *[Signature]*
LEV PARNAS

8/26/2022
DATE

By: *Joseph Bondy*
JOSEPH BONDY, ESQ.
Attorney for Defendant
~~401 Greenwich Street, 5th Floor~~ 1776 BROADWAY
New York, NY ~~10014~~ 10019
212-219-3572

8.26.2022
DATE

SO ORDERED:

HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

DATE